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FHWA Docket No. MC 92-10
Room 4232
Office of Chief Counsel
Federal Highway Administration
400 Seventh Street SW
Washington, D.C. 20590

Dear Sirs:

Pursuant to Federal Register Vol. 58, No. 10, I am submitting the following comments in regards to the proposed rule-making and questions for comment for Longer Combination Vehicle (LCV) training requirements.

Question 1. Definition of **LCV's** for the purpose of development of training guidelines should include those combinations with gross weight of less than 80,000 pounds and/or straight trucks pulling single or multiple trailers with overall length in excess of 72 feet.

Question 2. In order to make enforcement standards clear, all combination vehicles over 72 feet in length should require CDL endorsement and be defined as **requiring** LCV training for drivers.

Question 3. The FHWA should be responsible for establishing minimum training areas (i.e. braking, emergency maneuvers, hook-up, etc.). Such standards should be provided to each regulatory agency. In turn, the regulatory agency should be responsible for maintaining documentation regarding the content of their training program and certification of instructors. Such information should be available for FHWA review upon request.

Question 4. Agencies should maintain a standardized training syllabus, containing information pertinent to LCV operations approved under their laws, rules and regulations. Such syllabus should be filed with the FHWA. Instructors should

be required to attend an instructor development course covering the required items in the syllabus. Initial certification and recertification of instructors should be mandatory.

Question 5. Initial licensing of LCV instructors and certification of drivers should be accomplished by the State agency having responsibility for issuing such LCV special permits. (see Question 4).

Question 6. The State agency regulating LCV operations should be responsible for assuring requirements of LCV training are met. A card (similar to ICC medical) should be issued to the driver. As with CDL endorsements for **LCV's**, it should be the driver's responsibility to meet training requirements.

Question 7. In order to maintain integrity of the training program, evaluation and certification of training programs should be solely the responsibility of FHWA. Private and/or non-profit groups should not be utilized.

Question 8. No comment.

Question 9. Yes. Implementation of training certification requirement should be tied to the individual State renewal of the CDL license. (In New York State this would involve a 4 year transition period).

Question 10. Yes.


Question 11. Yes. Minimum of 5 years documentable.

Question 12. Instructors who teach an established minimum number of courses bi-annually, should be waived from a recertification requirement. Instructors not meeting such standard should be required to attend a re-certification after 2 years. Driver re-certification should be required at CDL license renewal.

Question 13. Yes.

If you have any additional questions or require further information regarding this response, please feel free to contact me at (518)-436-2816.

Sincerely,



Director, Traffic Management

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